

EXHIBIT K

From: Walton, David
Sent: Monday, June 1, 2020 1:27 PM
To: Seth Carson
Cc: Seth Carson; Bill Rieser; Benson, Leigh Ann; Sid Gold; Cavalier, Jonathan
Subject: Re: MEF - depos

Seth

As we have discussed and told you numerous times, we are not going forward with these depositions until we have a confidentiality agreement in place. During our last call, you indicated that the confidentiality agreement would not be a problem. Yet, we still haven't received a signed copy of the agreement. Please let us know – a final yes or no – if you are going to sign our proposed confidentiality agreement.

Sent from my iPad

On Jun 1, 2020, at 1:06 PM, Shana Washington <shana@dereksmithlaw.com> wrote:

****EXTERNAL SENDER****

Good Afternoon,

Please see the attached notices of depositions.

Shana Washington

PA Active Notary

Paralegal - Philadelphia

DEREK SMITH LAW GROUP, PLLC

Attorneys at Law

Employment Lawyers Representing Employees Exclusively

Toll Free No. (800) 807-2209

DiscriminationAndSexualHarassmentLawyers.com (website)

Philadelphia Office: 1835 Market Street, Suite 2950, Philadelphia, PA 19103 | (215) 391-4790

Philadelphia Fax: (215) 893-5288

NYC Office: One Penn Plaza, Suite 4905, New York, NY 10119 | (212) 587-0760

NJ Office: 73 Forest Lake Drive, West Milford, NJ 07421 | (973) 388-8625

Miami Office: 701 Brickell Avenue, Suite 1310, Miami, FL 33131 | (305) 946-1884

email: shana@dereksmithlaw.com

CONFIDENTIALITY NOTE: The information contained in this transmission is privileged and confidential information intended only for the use of the individual or entity named above. If the reader of this message is not the intended recipient, you are hereby notified that any dissemination, distribution or copying of this communication is strictly prohibited. If you have received this transmission in error, do not read it. Please immediately reply to the sender that you have received this communication in error

and then delete it. Thank you.

From: Walton, David <DWalton@cozen.com>

Sent: Wednesday, May 20, 2020 9:22 PM

To: Seth Carson <seth@dereksmithlaw.com>

Cc: Shana Washington <shana@dereksmithlaw.com>; Bill Rieser <brieser@discrimlaw.net>; Benson, Leigh Ann <LBenson@cozen.com>; Sid Gold <sgold@discrimlaw.net>; Cavalier, Jonathan <JCavalier@cozen.com>

Subject: Re: MEF - depos

I think Hollin and Levy are available then but please let me verify.

Dave Walton

Sent from my iPhone

On May 20, 2020, at 8:33 PM, Seth Carson <seth@dereksmithlaw.com> wrote:

****EXTERNAL SENDER****

Yes. I can do Bennett on 6/11 and Mark Fink on 6/11. It sounds like I can also do the two Steven Levy and Laurence Hollin on 6/11.

We will notice you for the following:

Daniel Pipes: June 10, 2020 beginning at 10:00 A.M.

Mark Fink: June 11, 2020 beginning at 10:00 A.M.

Mathew Bennett June 11, 2020 beginning at Noon.

Steven Levy June 11, 2020 beginning at 2:00 P.M.

Lawrence Hollin June 11, 2020 beginning at 4:00 P.M.

If you want to do them in another order or if you want to switch days that week, please let me know.

I need to get Greg Roman on the calendar and I would prefer not to do Greg Roman in the same couple day period of time.

Can you please give me a date for Greg Roman for the week of June 1 through June 5, 2020.

Seth D. Carson, Esquire
Derek Smith Law Group, PLLC
1835 Market Street
Suite 2950
Philadelphia, PA 19103
Phone: 215.391.4790
Facsimile: 215.893.5288
Direct: 484.678.2210
Email: Seth@DerekSmithLaw.com

CONFIDENTIALITY NOTE: The information contained in this transmission is privileged and confidential information intended only for the use of the individual or entity named above. If the reader of this message is not the intended recipient, you are hereby notified that any dissemination, distribution or copying of this communication is strictly prohibited. If you have received this transmission in error, do not read it. Please immediately reply to the sender that you have received this communication in error and then delete it. Thank you.

From: Walton, David <DWalton@cozen.com>
Sent: Wednesday, May 20, 2020 8:08 PM
To: Seth Carson <seth@dereksmithlaw.com>
Cc: Bill Rieser <brieser@discrimlaw.net>; Benson, Leigh Ann <LBenson@cozen.com>; Sid Gold <sgold@discrimlaw.net>; Cavalier, Jonathan <JCavalier@cozen.com>
Subject: Re: MEF - depos

Daniel 6-10 and Marc 6-11? Could you do Bennett on 6-11 too?

Dave Walton
Sent from my iPhone

On May 20, 2020, at 6:59 PM, Seth Carson <seth@dereksmithlaw.com> wrote:

****EXTERNAL SENDER****

I do not know how long I need with Mark but I know I need all day with Daniel Pipes. So no. I do not want to schedule any deps the same day as Daniel Pipes or Greg Roman.

Can you please give me the date for Greg Roman's deposition?

I gave you 10 days in the two week period of June 1 to June 12, 2020.

Seth D. Carson, Esquire
Derek Smith Law Group, PLLC
1835 Market Street
Suite 2950
Philadelphia, PA 19103
Phone: 215.391.4790
Facsimile: 215.893.5288
Direct: 484.678.2210
Email: Seth@DerekSmithLaw.com

CONFIDENTIALITY NOTE: The information contained in this transmission is privileged and confidential information intended only for the use of the individual or entity named above. If the reader of this message is not the intended recipient, you are hereby notified that any dissemination, distribution or copying of this communication is strictly prohibited. If you have received this transmission in error, do not read it. Please immediately reply to the sender that you have received this communication in error and then delete it. Thank you.

From: Walton, David <DWalton@cozen.com>
Sent: Tuesday, May 19, 2020 7:41 PM
To: Seth Carson <seth@dereksmithlaw.com>
Cc: Bill Rieser <brieser@discrimlaw.net>; Benson, Leigh Ann <LBenson@cozen.com>; Sid Gold <sgold@discrimlaw.net>; Cavalier, Jonathan <JCavalier@cozen.com>
Subject: MEF - depos

Seth

Please confirm that Ms. Brady will be available for the continuation of her deposition this Friday, May 22. Also, please let us know when Ms. Yonchek is available for the continuation of her deposition. We would like dates for next week.

Daniel Pipes is available on June 11 for his deposition. Would you like to schedule Marc Fink for the same day?

Thank you.

Dave

Dave Walton

Sent from my iPhone

Notice: This communication, including attachments, may contain information that is confidential and protected by the attorney/client or other privileges. It constitutes non-public information intended to be conveyed only to the designated recipient(s). If the reader or recipient of this communication is not the intended recipient, an employee or agent of the intended recipient who is responsible for delivering it to the intended recipient, or you believe that you have received this communication in error, please notify the sender immediately by return e-mail and promptly delete this e-mail, including attachments without reading or saving them in any manner. The unauthorized use, dissemination, distribution, or reproduction of this e-mail, including attachments, is prohibited and may be unlawful. Receipt by anyone other than the intended recipient(s) is not a waiver of any attorney/client or other privilege.

Notice: This communication, including attachments, may contain information that is confidential and protected by the attorney/client or other privileges. It constitutes non-public information intended to be conveyed only to the designated recipient(s). If the reader or recipient of this communication is not the intended recipient, an employee or agent of the intended recipient who is responsible for delivering it to the intended recipient, or you believe that you have received this communication in error, please notify the sender immediately by return e-mail and promptly delete this e-mail, including attachments without reading or saving them in any manner. The unauthorized use, dissemination, distribution, or reproduction of this e-mail, including attachments, is prohibited and may be unlawful. Receipt by anyone other than the intended recipient(s) is not a waiver of any attorney/client or other privilege.

Notice: This communication, including attachments, may contain information that is confidential and protected by the attorney/client or other privileges. It constitutes non-public information intended to be conveyed only to the designated recipient(s). If the reader or recipient of this communication is not the intended recipient, an employee or agent of the intended recipient who is responsible for delivering it to the intended recipient, or you believe that you have received this communication in error, please notify the sender immediately by return e-mail and promptly delete this e-mail, including attachments without reading or saving them in any manner. The unauthorized use, dissemination, distribution, or reproduction of this e-mail, including attachments, is prohibited and may be unlawful. Receipt by anyone other than the intended recipient(s) is not a waiver of any attorney/client or other privilege.

<Notice of Deposition for Matthew Bennett & Mark Fink.pdf>
<Updated Notice of Deposition for Daniel Pipes.pdf>